

## Biancamano Law, LLC

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May 5, 2023

Honorable Joseph H. Rodriguez  
United States District Court Judge  
District of New Jersey  
Mitchell H. Cohen Bldg. & U.S. Courthouse  
4<sup>th</sup> & Cooper Streets  
Camden, NJ 08101

### Re: United States v. John Grier (21-524)

Dear Judge Rodriguez:

We have received and reviewed the Government's proposed voir dire questions as well as the proposed instructions which precede them. We agree to the proposed voir dire questions and instructions subject to the following objections:

### **INSTRUCTIONS**

- We respectfully submit that deleting the paragraph that follows the bullet point listing of charges and begins with "The Government alleges..." would make the proposed instructions acceptable to the Defendant.

### **QUESTIONS**

- We respectfully submit that (1) deleting question numbers 29; 35; 39; 79; 82 – 91; & 94; (2) revising the second sentence of question 68 to read "...and attorneys Stacy Ann Biancamano and Daniel Holzapfel of the law firm of Biancamano Law,"; and (3) revising the first sentence of question number 72 to read "This case involves allegations that the Defendant utilized excessive force and submitted a false police report regarding that force." would make the proposed voir dire questions acceptable to the Defendant.
  - Defendant has no additional voir dire questions to propose at this time.
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Thank you for Your Honor's time and thoughtful consideration in this regard.

Respectfully submitted,

*s/ Daniel Holzapfel*

Daniel Holzapfel

Encls.

CC: Jason Richardson, AUSA  
Lindsey Harteis, AUSA  
Stuart Alterman, Esq.  
Daniel Holzapfel, Esq.  
John Grier